

quinn emanuel trial lawyers | newyork

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7360

WRITER'S EMAIL ADDRESS
kevinreed@quinnemanuel.com

September 4, 2024

VIA ECF AND EMAIL

The Honorable John P. Cronan
United States District Court, S.D.N.Y.
500 Pearl Street
New York, New York 10007

Re: *Frank Brunckhorst III v. Eric Bischoff et al.*, No. 1:21-cv-04362-JPC

Dear Judge Cronan,

We represent Plaintiff Frank Brunckhorst III in the above-referenced action. Pursuant to Rule 3.B of Your Honor's Individual Rules and Practices in Civil Cases, we write to request that the parties' deadline to file a proposed joint order with a table of the remaining sealing requests and to file any proposed redactions to the Court's August 29, 2024 Opinion and Order [Dkt. 467], as directed by the Court on page 54 of the Order, be extended from September 5, 2024 to September 9, 2024. The requested extension is necessary to allow time to advise interested third parties Robert S. Martin and Farbest Foods Inc., who have previously requested the redaction of confidential material in the case, and afford them the opportunity to weigh in.

Counsel for Defendants Susan Stravitz Kemp and Todd Stravitz (the "Trustees") consent to the request. Counsel for Defendant Eric Bischoff does not oppose the request. There has been no previous request for an extension of this deadline, and the requested extension does not affect any other scheduled dates or deadlines.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Kevin S. Reed
Kevin S. Reed

The request for an extension of the deadline to file proposed redactions and a joint letter with a table of the remaining sealing requests is granted. These materials are due by September 9, 2024. The seal on the Court's Opinion and Order, Dkt. 467, is lifted as to the parties only to the extent necessary for joint coordination with the interested third parties on the preparation of the requested materials. The Clerk of Court is respectfully directed to close Docket Number 468.

SO ORDERED.
Date: September 4, 2024
New York, New York


JOHN P. CRONAN
United States District Judge

quinn emanuel urquhart & sullivan, llp

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